

Matthew L. Tuccillo

Partner

April 1, 2025

Via ECF

MEMO ENDORSED

at page 2

Hon. Edgardo Ramos
U.S. District Judge
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: In re MINISO Group Holding Limited Securities Litigation (1:22-cv-09864-ER)

Dear Judge Ramos:

I write on behalf of Lead Plaintiff The Nova Scotia Health Employees' Pension Plan and named Plaintiff Adeel Ashraf ("Plaintiffs") and as Lead Counsel in the above-captioned matter. Pursuant to Local Civ. R. 7.1(e) and Your Honor's Individual Practice 1.E., Plaintiffs respectfully request an extension of the deadline to file a third amended complaint, which the Court just set at April 14, 2025 by its Order entered on March 31, 2025 (ECF 109). Plaintiffs respectfully request that this deadline be extended by 16 days, to April 30, 2025, for the following reasons.

This is our fifth extension request. We sought a 14-day extension to respond to Defendants' pre-motion to dismiss letters in February 2023 (ECF 54); a 6-day extension to respond to Defendants' motion to dismiss filings in August 2023 (ECF 70); a 14-day extension to move for reconsideration with a 26-day extension to further amend in March 2024 (ECF 98); and a request shortly after to modify that amendment deadline to 2 weeks after the court's reconsideration motion ruling "barring an emergency" (ECF 104). All prior requests were granted. See ECFs 55, 71, 100, 105. There would be no impact to the case schedule, which lacks any other deadlines at this time, including any schedule for further motion to dismiss briefing.

Unfortunately, I am in the latter stages of dealing with an ongoing family medical emergency. My mother had unplanned, emergency surgery on March 9, 2025, with life-altering impacts, followed by weeks of hospitalization and rehabilitation facility time. During that time, I took up temporary residence with my father, who requires daily assistance, and we both tested positive for COVID. In addition to the stress caused by my mother's serious medical issue, I have been coordinating her care at the hospital, at rehab, and newly at home, while overcoming COVID effects of fatigue and triggered asthma. All these circumstances significantly impacted my workflow, despite best efforts. At present, in addition to the April 14, 2025 deadline just set by Your Honor, I have an appellate brief due April 11, 2025 on an extended schedule, and briefs in two other matters due April 11 and 18, 2025 on statutorily set deadlines. I also have a pre-scheduled family trip during my children's spring break week from April 12 – 20, 2025.

Upon seeing Your Honor's Order (ECF 109), I promptly contacted counsel for Defendants, who extended well wishes and took no position on my request to extend the third amended complaint deadline to April 30, 2025. During our communications, I suggested that I could use this letter also to propose a briefing schedule on the ensuing motion to dismiss, whereby

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Defendants would have 60 days to move to dismiss, Plaintiffs would have 60 days to oppose, and Defendants would have 30 days to reply. Defendants agreed to that proposal. If the Court grants the requested extension on the third amended complaint, making it due April 30, 2025, then the proposed briefing schedule would set Defendants' motion deadline at June 30, 2025, Plaintiffs' opposition deadline at August 29, 2025, and Defendants' reply deadline at September 29, 2025.

I can be available to answer the Court's questions and appreciate its time and attention.

Respectfully submitted,



Matthew L. Tuccillo

Counsel of record (via ECF)

Plaintiffs' request is granted. Plaintiffs are directed to file the third amended complaint by April 30, 2025. The Court enters the following briefing schedule for the motion to dismiss: (1) moving papers due June 30, 2025, (2) opposition due August 29, 2025, and (3) reply due September 29, 2025.

SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: April 3, 2025
New York, New York